

## REMARKS

Claims 1-44 are currently pending, with claims 1, 10, 16 and 44 being the independent claims. Claims 1-3, 8, 10, 11-14, 16-18, 21-26 and 29-39 have been amended. Independent claim 45 has been added. The amendments to claims 23, 24 and 29-33 clarify the wording of the claims, and are cosmetic in nature. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

Claims 1, 3, 5, 6, 8, 11, 12, 14, 15, 18, 21, 23-26 and 34-39 were objected to based on the inclusion therein of allegedly undefined abbreviations. In response to the objections, Applicant has amended the claims such that the abbreviations have been replaced by the appropriate terms. Reconsideration and withdrawal of the objections to the claims are respectfully requested.

In the April 25, 2006 Office Action, independent claims 1, 10 and 16 were rejected under 35 U.S.C. §103(a) as unpatentable over JP 09-114891 ("*Igarashi*") in view of "Sure Identification of individual terminals in terms of their identification numbers and with the aid of authentication circuits" ("*Eda*"). For the following reasons, it is respectfully submitted that all claims of the present application are patentable over the cited references.

Independent claim 1 has been amended to recite that the first network comprises a GPRS network, and the second network comprises an IP network. Support for this amendment may be found, for example, at pg. 5, lines 5-9; pg. 7, lines 1-6 and in Fig. 1 of the originally filed specification. No new matter has been added.

*Igarashi* (paragraph [0104] of the computer translation) states, "although one accounting proxy 11 was formed to the Internet 3, two or more accounting proxies 11-1 [thru] 11-3 are connected to the Internet, and you may make ... each accounting proxy 11-1 [thru] 11-3 ... [connect via] ... the dedicated line 81 in the example of drawing 1, as shown in drawing 18". Thus, *Igarashi* teaches an IP network that is connected to a conventional landline telephone network. That is, *Igarashi* teaches two networks, where one is the Internet and the other constitutes conventional telephone lines, as shown in Fig. 18. *Igarashi* thus fails to teach or suggest a gated GPRS network, i.e., a general packet radio services network. Consequently, *Igarashi* fails to teach or suggest a solution to the problem underlying the present application, i.e. amended independent claim 1.

*Igarashi* is directed to solving a completely different problem than the problem solved by the invention recited in Applicant's amended independent claim 1. That is, *Igarashi* is directed

to a method for charging subscribers, where the subscribers are not subscribed to another network. In contrast, the claimed invention is directed to solving the problem of identifying a mobile subscriber of a first network in a second network, such as the subscriber in a GPRS network, who attempts to obtain access to services in the Internet (see pg. 2, line 22 thru pg. 3, line 19 of the originally filed application).

In any event, the Examiner concedes *Igarashi* fails to teach or suggest “the subscriber identity being IMSI”. *Eda* has been cited to provide what *Igarashi* lacks. However, the combination of *Igarashi* and *Eda* fails to teach amended independent claim 1. *Eda* discloses various identification techniques. In particular, the cited section of *Eda* teaches basic mapping between a phone number of a cell phone and a “proper number” of the subscriber. However, this mapping does not serve to clearly identify a subscriber of a first network in a second network. Consequently, *Eda* fails to teach or suggest the subject matter of the independent claim 1.

Moreover, *Igarashi* and *Eda*, individually or in combination, fail to teach or suggest that a subscriber is identified in a value added service platform based on mapping information. Consequently, *Igarashi* or *Eda*, individually or in combination, would not have provided the motivation for a person skilled in the art at the time of the invention to attempt to achieve the claimed method such that independent claim 1 would have been obvious. Therefore, independent claim 1 is patentable over the combination of *Igarashi* and *Eda*, withdrawal of the rejection under 35 U.S.C. §103 is in order, and a notice to this effect is earnestly solicited.

Independent claims 10 and 16 are apparatus claims associated with the method of independent claim 1. Accordingly, independent claims 10 and 16 are patentable over the combination of the cited references for the reasons discussed above with respect to independent method claim 1.

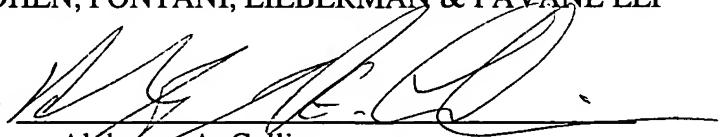
New independent claim 45 is an apparatus claim that corresponds to independent method claim 1. Accordingly, new independent claim 44 is also patentable over the combination of the cited references for the reasons discussed above with respect to independent method claim 1.

In view of the patentability of independent claims 1, 10, 16 and 44, for the reasons set forth above, dependent claims 2-9, 11-15 and 17-43 are all patentable over the prior art.

Based on the foregoing amendments and remarks, this application should be in condition for allowance. Early passage of this case to issue is respectfully requested.

Respectfully submitted,  
COHEN, PONTANI, LIEBERMAN & PAVANE LLP

By

A handwritten signature in black ink, appearing to read 'A. Collins', is written over a horizontal line.

Alphonso A. Collins

Reg. No. 43,559

551 Fifth Avenue, Suite 1210

New York, New York 10176

(212) 687-2770

Dated: August 25, 2006